

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LEAH MIRABELLA, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

RUE LA LA, INC. and KYNETIC LLC,

Defendants.

C.A. No. 1:13-cv-11392-GAO

Class Action

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES,
EXPENSES AND REPRESENTATIVE PLAINTIFF'S SERVICE PAYMENTS**

Plaintiff Leah Mirabella ("Plaintiff") respectfully moves the Court for award of attorneys' fees, expenses and the Representative Plaintiff's service payment. On November 13, 2014, this Court preliminarily granted approval of the Settlement Agreement made between Plaintiff and Rue La La, Inc. and Kynetic LLC ("Defendants"), and certified the class for settlement purposes. [Doc. 29].

In support of her request, Plaintiff asserts, *inter alia*, that the proposed attorneys' fees and expenses award (\$250,000) and Representative Plaintiff's service payment (\$2,500) are fair, reasonable, and adequate.

In further support of this Motion, Plaintiff refers the Court to her Memorandum in Support of Motion for an Award of Attorneys' Fees, Expenses and Representative Plaintiff's Service Payment, the accompanying declarations, submitted herewith, and all documents filed of

record in this matter. Defendants do not oppose the relief requested in this Motion. A proposed provision granting the relief requested by this Motion appears at Paragraphs 18-19 of the agreed Final Judgment and Order of Dismissal, which is attached to the parties' Joint Motion for Final Approval of Class Action Settlement.

WHEREFORE, Plaintiff respectfully requests this Court grant this Motion for Award of Attorneys' Fees, Expenses and Representative Plaintiff's Service Payments.

Dated: February 27, 2015

Respectfully Submitted,

/s/ Matthew E. Miller
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LOCAL RULE 7.1 CERTIFICATE

I hereby certify pursuant to Local Rule 7.1(a)(2) that the moving party has conferred in good faith with opposing counsel on the matter set forth herein and that opposing counsel does not oppose the relief sought herein.

/s/ Matthew E. Miller

Matthew E. Miller (BBO# 559353)

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to each of attorney of record in this case.

/s/ Matthew E. Miller

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